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12 Attorneys for plaintiff ABHINAV BHATNAGAR

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15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA

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18 ABHINAV BHATNAGAR,

19 Plaintiff

20 v.

21 JASON INGRASSIA, et al.,

22 Defendants.

No. CV07-02669 CRB

STIPULATION AND ~~(PROPOSED)~~ ORDER
TO EXTEND DEADLINE FOR TO MEET
AND CONFER AND TO FILE
SUPPLEMENTARY DECLARATION RE:
CONTRA COSTA COUNTY'S MOTION
FOR ATTORNEY'S FEES

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25 IT IS HEREBY STIPULATED by and between plaintiff ABHINAV BHATNAGAR
26 and defendants JASON INGRASSIA and CONTRA COSTA COUNTY, by and through their
27 counsel of record, that the deadline to complete the meet-and-confer process and file the
28 supplementary declaration pursuant to this court's order of April 16, 2009 may be extended to

STIPULATION AND (PROPOSED) ORDER TO EXTEND DEADLINE TO MEET AND CONFER
AND TO FILE SUPPLEMENTARY DECLARATION RE: CONTRA COSTA COUNTY'S MOTION
FOR ATTORNEY'S FEES - CV07-02669 CRB

1 May 29, 2009 for the reasons stated in the attached Declaration of Gregory C. Harvey.

2 The parties stipulate to the following filing schedule:

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4 May 29, 2009 Completion of meet and confer and filing of
5 supplementary declaration regarding fees
6 attributed to the claim of harassing phone
7 calls.

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9 June 5, 2009 Filing of Plaintiffs objections to the
10 supplementary declarations of Defendants
11 Ingrassia and the County.

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13 June 12, 2009 Filing of Defendants' reply to Plaintiffs
14 objections to the supplementary declarations.

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16 SO STIPULATED.

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18 DATED: April 21, 2009

SILVANO B. MARCHESI, County Counsel

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21 By: /s/
22 GREGORY C. HARVEY
23 Assistant County Counsel
24 Attorneys for Defendants
25 COUNTY OF CONTRA COSTA and
26 CITY OF SAN RAMON
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1 DATED: April 22, 2009

JUSTICE FIRST, LLP

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4 By: /s/
5 JENNY HUANG
6 Attorneys for Plaintiff
7 ABHINAV BHATNAGAR

8 DATED: April 22, 2009

MCNAMARA DODGE ET AL., LLP

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11 By: /s/
12 JAMES V. FITZGERALD III
13 Attorneys for Defendant
14 JASON INGRASSIA
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ORDER

IT IS HEREBY ORDERED THAT the deadline for plaintiff and defendants JASON INGRASSIA and CONTRA COSTA COUNTY to complete the meet-and-confer process and for defendants JASON INGRASSIA and CONTRA COSTA COUNTY to file their supplementary declarations pursuant to this court's order of April 16, 2009 is hereby extended to and including May 29, 2009. The court adopts the filing schedule proposed by the parties.

SO ORDERED.

DATE: April 27, 2009

